

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
STEPHEN GRAY, individually and on :  
behalf of all others similarly situated, :

Plaintiff, :

v. :

CITIGROUP INC., CHARLES PRINCE, :  
THE PLANS ADMINISTRATIVE :  
COMMITTEE OF CITIGROUP INC., :  
THE 401(k) INVESTMENT :  
COMMITTEE, and JOHN DOES 1 - 20, :

Defendants. :  
-----X

SHAUN ROSE, Individually and On :  
Behalf of All Others Similarly Situated, :

Plaintiff, :

v. :

CITIGROUP INC., CHARLES PRINCE, :  
THE PLANS ADMINISTRATIVE :  
COMMITTEE OF CITIGROUP INC., :  
THE 401(k) INVESTMENT :  
COMMITTEE, and JOHN DOES 1 - 10, :

Defendants. :  
-----X

MEREDITH TRANBERG, individually :  
and on behalf of all others similarly situated :

Plaintiff, :

v. :

CITIGROUP INC., CHARLES PRINCE, :  
THE PLANS ADMINISTRATIVE :  
COMMITTEE OF CITIGROUP INC., :  
THE 401(k) INVESTMENT :  
COMMITTEE, and JOHN DOES 1 - 20, :

Defendants. :  
-----X

Civil Action No: 07 Civ. 9790 (SHS)

**NOTICE OF MOTION TO  
ADMIT BRUCE K.  
RINALDI PRO HAC VICE**

FILED  
U.S. DISTRICT COURT  
2008 JAN 15 PM 4:30  
S.D. OF N.Y.

Civil Action No: 07 Civ. 10294

Civil Action No: 07 Civ. 10341

JAN 15 2008

#638347 25 -

-----X  
ANTON RAPPOLD, individually and on :  
behalf of all others similarly situated, :  
 :  
Plaintiff, : Civil Action No: 07 Civ. 10396  
v. :  
 :  
CITIGROUP INC., CITIBANK, N.A., :  
CHARLES PRINCE, THE PLANS :  
ADMINISTRATIVE COMMITTEE OF :  
CITIGROUP INC., THE 401(k) :  
INVESTMENT COMMITTEE, and JOHN :  
and JANE DOES 1 - 10, :  
 :  
Defendants. :  
-----X

SAMIER TADROS, on Behalf of All :  
Others Similarly Situated, :  
 :  
Plaintiff, : Civil Action No: 07 Civ. 10442  
v. :  
 :  
CITIGROUP INC., CHARLES O. :  
PRINCE, C. MICHAEL ARMSTRONG, :  
ALAIN J.P. BELDA, GEORGE DAVID, :  
KENNETH T. DERR, JOHN M. DEUTCH, :  
ROBERTO HERNANDEZ RAMIREZ, :  
ANN DIBBLE JORDAN, KLAUS :  
KLEINFELD, ANDREW N. LIVERIS, :  
ANNE MULCAHY, RICHARD D. :  
PARSONS, JUDITH RODIN, ROBERT E. :  
RUBIN, ROBERT E. RUBIN, FRANKLIN :  
A. THOMAS, JOHN DOES 1-20 (BEING :  
CURRENT AND FORMER MEMBERS :  
OF THE PLANS ADMINISTRATIVE :  
COMMITTEE OF CITIGROUP INC.) :  
and JOHN DOES 21-40 (BEING :  
CURRENT AND FORMER MEMBERS :  
OF THE INVESTMENT COMMITTEE :  
OF THE CITIGROUP INC. 401(K) PLAN), :  
 :  
Defendants. :  
-----X

-----X  
STEPHAN FIORINO, individually and on :  
behalf of all others similarly situated, :  
 :  
Plaintiff, : Civil Action No: 07 Civ. 10458  
v. :  
 :  
CITIGROUP INC., CITIBANK N.A., :  
CHARLES PRINCE, THE PLANS :  
ADMINISTRATIVE COMMITTEE OF :  
CITIGROUP INC., THE 401(k) :  
INVESTMENT COMMITTEE, and :  
JOHN DOES 1 - 20, :  
 :  
Defendants. :  
-----X

JAMES BOLLA, individually and on behalf :  
of all others similarly situated, :  
 :  
Plaintiff, : Civil Action No: 07 Civ. 10461  
v. :  
 :  
CITIGROUP INC., CITIBANK N.A., :  
CHARLES PRINCE, THE PLANS :  
ADMINISTRATIVE COMMITTEE OF :  
CITIGROUP INC., THE 401(k) :  
INVESTMENT COMMITTEE, and :  
JOHN DOES 1 - 20, :  
 :  
Defendants. :  
-----X

-----X  
MARK GEROULO, individually, on behalf :  
of the CITIGROUP 401(k) Plan, the :  
CITIBUILDER 401 (K) PLAN FOR :  
PUERTO RICO, and all others similarly, :  
:  
Plaintiff, : Civil Action No: 07 Civ. 10472  
v. :  
:  
CITIGROUP, INC., CITIBANK, N.A., :  
THE PLAN ADMINISTRATIVE :  
COMMITTEE OF CITIGROUP, INC., :  
MICHAEL E. SCHLEIN, JOHN DOES :  
1-10, THE CITIGROUP 401(k) PLAN :  
INVESTMENT COMMITTEE and JOHN :  
DOES 10-20, C. MICHAEL :  
ARMSTRONG, ALAN J.P. BELDA, :  
GEORGE DAVID, KENNETH T. DERR, :  
JOHN M. DEUTCH, ROBERTO :  
HERNANDEZ, ANN DIBBLE JORDAN, :  
ANDREW N. LIVERIS, DUDLEY C. :  
MECUM, ANNE M. MULCAHY, :  
RICHARD D. PARSONS, ANDRALL E. :  
PEARSON, CHARLES PRINCE, JUDITH :  
RODIN, ROBERT E. RUBIN, FRANKLIN :  
A. THOMAS, SANFORD I. WEILL, :  
:  
Defendants. :  
-----X

-----X	
ALAN STEVENS, on Behalf of Himself	:
and All Others Similarly Situated,	:
	:
Plaintiff,	:
v.	:
	:
CITIGROUP INC., CITIBANK, N.A,	:
CHARLES PRINCE, C. MICHAEL	:
ARMSTRONG, ALAIN J.P. BELDA,	:
GEORGE DAVID, KENNETH T. DERR,	:
JOHN M. DEUTCH, PETER JOHNSON,	:
ROBERTO HERNANDEZ RAMIREZ,	:
ANDREW N. LIVERIS, ANNE	:
MULCAHEY, RICHARD D. PARSONS,	:
JUDITH RODIN, ROBERT E. RUBIN,	:
ROBERT L. RYAN, FRANKLIN A.	:
THOMAS, THE PLANS	:
ADMINISTRATION COMMITTEE OF	:
CITIGROUP, INC., THE INVESTMENT	:
COMMITTEE and JOHN DOES 1-30,	:
	:
Defendants.	:

Civil Action No: 07 Civ. 11156

-----X	
STEPHEN GOLDSTEIN, on Behalf of	:
Himself and a Class of Persons Similarly	:
Situated,	:
	:
Plaintiff,	:
v.	:
	:
CITIGROUP INC., THE PLANS	:
ADMINISTRATION COMMITTEE OF	:
CITIGROUP, INC., MICHAEL E.	:
SCHLEIN, CHARLES PRINCE, C.	:
MICHAEL ARMSTRONG, ALAIN J.P.	:
BELDA, GEORGE DAVID, KENNETH T.	:
DERR, JOHN M. DEUTCH, ROBERTO	:
HERNANDEZ RAMIREZ, ANDREW N.	:
LIVERIS, ANNE MULCAHEY,	:
RICHARD D. PARSONS, JUDITH	:
RODIN, ROBERT E. RUBIN, ROBERT L.	:
RYAN, AND FRANKLIN A. THOMAS,	:
And JOHN DOES 1-30,	:
	:
Defendants.	:

Civil Action No: 07 Civ. 11158

-----X	
CHRIS SOUTHARD, on Behalf of All	:
Others Similarly Situated,	:
	:
Plaintiff,	:
v.	:
	:
CITIGROUP INC., CHARLES O.	:
PRINCE, C. MICHAEL ARMSTRONG,	:
ALAIN J.P. BELDA, GEORGE DAVID,	:
KENNETH T. DERR, JOHN M. DEUTCH,	:
ROBERTO HERNANDEZ RAMIREZ,	:
ANN DIBBLE JORDAN, KLAUS	:
KLEINFELD, ANDREW N. LIVERIS,	:
ANNE MULCAHY, RICHARD D.	:
PARSONS, JUDITH RODIN, ROBERT E.	:
RUBIN, ROBERT E. RUBIN, FRANKLIN	:
A. THOMAS, JOHN DOES 1-20 (BEING	:
CURRENT AND FORMER MEMBERS	:
OF THE PLANS ADMINISTRATIVE	:
COMMITTEE OF CITIGROUP INC.)	:
and JOHN DOES 21-40 (BEING	:
CURRENT AND FORMER MEMBERS	:
OF THE INVESTMENT COMMITTEE	:
OF THE CITIGROUP INC. 401(K) PLAN),	:
	:
Defendants.	:
-----	

Civil Action No: 07 Civ. 11164

FRANCIA BRICK, individually and on	:
Behalf of all others similarly situated,	:
	:
Plaintiff,	:
v.	:
	:
CITIGROUP INC., CHARLES PRINCE,	:
THE PLAN'S ADMINISTRATIVE	:
COMMITTEE OF CITIGROUP, INC.,	:
THE 401(k) INVESTMENT COMMITTEE,	:
And JOHN DOES 1-10,	:
	:
Defendants.	:
-----	

Civil Action No: 07 Civ. 11369

-----X	
WILLIAM and PATRICIA WOODWARD,	:
individually and on Behalf of All Others	:
Similarly Situated,	:
	:
Plaintiffs,	:
v.	:
	:
CITIGROUP INC., CHARLES PRINCE,	:
ROBERT E. RUBIN, C. MICHAEL	:
ARMSTRONG, ALAIN J. P. BELDA,	:
GEORGE DAVID, KENNETH T. DERR,	:
JOHN M. DEUTCH, ROBERTO	:
HERNANDEZ RAMIREZ, ANDREW N.	:
LIVERIS, ANN MULCAHEY, RICHARD	:
D. PARSONS, JUDITH RODIN, ROBERT	:
L. RYAN, FRANKLIN A. THOMAS, ANN	:
DIBBLE JORDAN, KLAUS KLEINFELD	:
AND DUDLEY C. MECUM, and JOHN	:
and JANE DOES 1-10,	:
	:
Defendants.	:
-----	

Civil Action No: 07cv11207

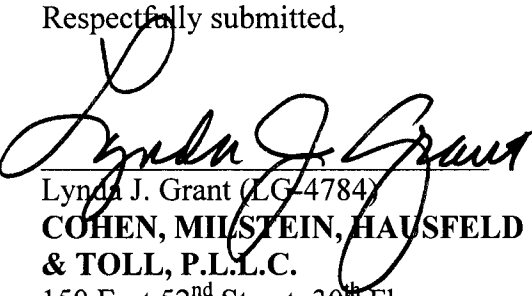
**NOTICE OF MOTION TO ADMIT**  
**BRUCE F. RINALDI *PRO HAC VICE***

PLEASE TAKE NOTICE that upon the annexed Declaration of Lynda J. Grant, the Affidavit of Bruce F. Rinaldi and the Certificate of Good Standing annexed thereto, the undersigned will move this Court, before the Honorable Sidney H. Stein on a date to be determined by the Court, in the United States Courthouse, 500 Pearl Street, Courtroom 23A, New York, New York 10007, for an Order (attached hereto), pursuant to Rule

1.3(c) of the Local Rules of the United States District Courts for the Southern District and Eastern Districts of New York, admitting Bruce F. Rinaldi *pro hac vice*.

Dated: January 15, 2008

Respectfully submitted,



Lynda J. Grant (LG-4784)  
**COHEN, MILSTEIN, HAUSFELD  
& TOLL, P.L.L.C.**  
150 East 52<sup>nd</sup> Street, 30<sup>th</sup> Floor  
New York, New York 10022  
(212) 838-7797



UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
STEPHEN GRAY, individually and on  
behalf of all others similarly situated,

Plaintiff,

v.

CITIGROUP INC., CHARLES PRINCE,  
THE PLANS ADMINISTRATIVE  
COMMITTEE OF CITIGROUP INC.,  
THE 401(k) INVESTMENT  
COMMITTEE, and JOHN DOES 1 - 20,

Defendants.  
-----X

Civil Action No: 07 Civ. 9790 (SHS)

SHAUN ROSE, Individually and On  
Behalf of All Others Similarly Situated,

Plaintiff,

v.

CITIGROUP INC., CHARLES PRINCE,  
THE PLANS ADMINISTRATIVE  
COMMITTEE OF CITIGROUP INC.,  
THE 401(k) INVESTMENT  
COMMITTEE, and JOHN DOES 1 - 10,

Defendants.  
-----X

Civil Action No: 07 Civ. 10294

MEREDITH TRANBERG, individually  
and on behalf of all others similarly situated

Plaintiff,

v.

CITIGROUP INC., CHARLES PRINCE,  
THE PLANS ADMINISTRATIVE  
COMMITTEE OF CITIGROUP INC.,  
THE 401(k) INVESTMENT  
COMMITTEE, and JOHN DOES 1 - 20,

Defendants.  
-----X

Civil Action No: 07 Civ. 10341

-----X  
ANTON RAPPOLD, individually and on :  
behalf of all others similarly situated, :  
 :  
Plaintiff, : Civil Action No: 07 Civ. 10396  
v. :  
 :  
CITIGROUP INC., CITIBANK, N.A., :  
CHARLES PRINCE, THE PLANS :  
ADMINISTRATIVE COMMITTEE OF :  
CITIGROUP INC., THE 401(k) :  
INVESTMENT COMMITTEE, and JOHN :  
and JANE DOES 1 - 10, :  
 :  
Defendants. :  
-----X

SAMIER TADROS, on Behalf of All :  
Others Similarly Situated, :  
 :  
Plaintiff, : Civil Action No: 07 Civ. 10442  
v. :  
 :  
CITIGROUP INC., CHARLES O. :  
PRINCE, C. MICHAEL ARMSTRONG, :  
ALAIN J.P. BELDA, GEORGE DAVID, :  
KENNETH T. DERR, JOHN M. DEUTCH, :  
ROBERTO HERNANDEZ RAMIREZ, :  
ANN DIBBLE JORDAN, KLAUS :  
KLEINFELD, ANDREW N. LIVERIS, :  
ANNE MULCAHY, RICHARD D. :  
PARSONS, JUDITH RODIN, ROBERT E. :  
RUBIN, ROBERT E. RUBIN, FRANKLIN :  
A. THOMAS, JOHN DOES 1-20 (BEING :  
CURRENT AND FORMER MEMBERS :  
OF THE PLANS ADMINISTRATIVE :  
COMMITTEE OF CITIGROUP INC.) :  
and JOHN DOES 21-40 (BEING :  
CURRENT AND FORMER MEMBERS :  
OF THE INVESTMENT COMMITTEE :  
OF THE CITIGROUP INC. 401(K) PLAN), :  
 :  
Defendants. :  
-----X

-----X  
STEPHAN FIORINO, individually and on :  
behalf of all others similarly situated, :  
:  
Plaintiff, : Civil Action No: 07 Civ. 10458  
v. :  
:  
CITIGROUP INC., CITIBANK N.A., :  
CHARLES PRINCE, THE PLANS :  
ADMINISTRATIVE COMMITTEE OF :  
CITIGROUP INC., THE 401(k) :  
INVESTMENT COMMITTEE, and :  
JOHN DOES 1 - 20, :  
:  
Defendants. :  
-----X

JAMES BOLLA, individually and on behalf :  
of all others similarly situated, :  
:  
Plaintiff, : Civil Action No: 07 Civ. 10461  
v. :  
:  
CITIGROUP INC., CITIBANK N.A., :  
CHARLES PRINCE, THE PLANS :  
ADMINISTRATIVE COMMITTEE OF :  
CITIGROUP INC., THE 401(k) :  
INVESTMENT COMMITTEE, and :  
JOHN DOES 1 - 20, :  
:  
Defendants. :  
-----X

-----X  
MARK GEROULO, individually, on behalf :  
of the CITIGROUP 401(k) Plan, the :  
CITIBUILDER 401 (K) PLAN FOR :  
PUERTO RICO, and all others similarly, :

Plaintiff, :

v. :

CITIGROUP, INC., CITIBANK, N.A., :  
THE PLAN ADMINISTRATIVE :  
COMMITTEE OF CITIGROUP, INC., :  
MICHAEL E. SCHLEIN, JOHN DOES :  
1-10, THE CITIGROUP 401(k) PLAN :  
INVESTMENT COMMITTEE and JOHN :  
DOES 10-20, C. MICHAEL :  
ARMSTRONG, ALAN J.P. BELDA, :  
GEORGE DAVID, KENNETH T. DERR, :  
JOHN M. DEUTCH, ROBERTO :  
HERNANDEZ, ANN DIBBLE JORDAN, :  
ANDREW N. LIVERIS, DUDLEY C. :  
MECUM, ANNE M. MULCAHY, :  
RICHARD D. PARSONS, ANDRALL E. :  
PEARSON, CHARLES PRINCE, JUDITH :  
RODIN, ROBERT E. RUBIN, FRANKLIN :  
A. THOMAS, SANFORD I. WEILL, :

Defendants. :

Civil Action No: 07 Civ. 10472

-----X

-----X  
ALAN STEVENS, on Behalf of Himself  
and All Others Similarly Situated,

Plaintiff,

v.

CITIGROUP INC., CITIBANK, N.A,  
CHARLES PRINCE, C. MICHAEL  
ARMSTRONG, ALAIN J.P. BELDA,  
GEORGE DAVID, KENNETH T. DERR,  
JOHN M. DEUTCH, PETER JOHNSON,  
ROBERTO HERNANDEZ RAMIREZ,  
ANDREW N. LIVERIS, ANNE  
MULCAHEY, RICHARD D. PARSONS,  
JUDITH RODIN, ROBERT E. RUBIN,  
ROBERT L. RYAN, FRANKLIN A.  
THOMAS, THE PLANS  
ADMINISTRATION COMMITTEE OF  
CITIGROUP, INC., THE INVESTMENT  
COMMITTEE and JOHN DOES 1-30,

Defendants.  
-----X

Civil Action No: 07 Civ. 11156

STEPHEN GOLDSTEIN, on Behalf of  
Himself and a Class of Persons Similarly  
Situated,

Plaintiff,

v.

CITIGROUP INC., THE PLANS  
ADMINISTRATION COMMITTEE OF  
CITIGROUP, INC., MICHAEL E.  
SCHLEIN, CHARLES PRINCE, C.  
MICHAEL ARMSTRONG, ALAIN J.P.  
BELDA, GEORGE DAVID, KENNETH T.  
DERR, JOHN M. DEUTCH, ROBERTO  
HERNANDEZ RAMIREZ, ANDREW N.  
LIVERIS, ANNE MULCAHEY,  
RICHARD D. PARSONS, JUDITH  
RODIN, ROBERT E. RUBIN, ROBERT L.  
RYAN, AND FRANKLIN A. THOMAS,  
And JOHN DOES 1-30,

Defendants.

Civil Action No: 07 Civ. 11158

-----X		
CHRIS SOUTHARD, on Behalf of All	:	
Others Similarly Situated,	:	
	:	
Plaintiff,	:	Civil Action No: 07 Civ. 11164
v.	:	
	:	
CITIGROUP INC., CHARLES O.	:	
PRINCE, C. MICHAEL ARMSTRONG,	:	
ALAIN J.P. BELDA, GEORGE DAVID,	:	
KENNETH T. DERR, JOHN M. DEUTCH,	:	
ROBERTO HERNANDEZ RAMIREZ,	:	
ANN DIBBLE JORDAN, KLAUS	:	
KLEINFELD, ANDREW N. LIVERIS,	:	
ANNE MULCAHY, RICHARD D.	:	
PARSONS, JUDITH RODIN, ROBERT E.	:	
RUBIN, ROBERT E. RUBIN, FRANKLIN	:	
A. THOMAS, JOHN DOES 1-20 (BEING	:	
CURRENT AND FORMER MEMBERS	:	
OF THE PLANS ADMINISTRATIVE	:	
COMMITTEE OF CITIGROUP INC.)	:	
and JOHN DOES 21-40 (BEING	:	
CURRENT AND FORMER MEMBERS	:	
OF THE INVESTMENT COMMITTEE	:	
OF THE CITIGROUP INC. 401(K) PLAN),	:	
	:	
Defendants.	:	

-----		
FRANCIA BRICK, individually and on	:	
Behalf of all others similarly situated,	:	
	:	
Plaintiff,	:	Civil Action No: 07 Civ. 11369
v.	:	
	:	
CITIGROUP INC., CHARLES PRINCE,	:	
THE PLAN'S ADMINISTRATIVE	:	
COMMITTEE OF CITIGROUP, INC.,	:	
THE 401(k) INVESTMENT COMMITTEE,	:	
And JOHN DOES 1-10,	:	
	:	
Defendants.	:	
-----		

-----X	
WILLIAM and PATRICIA WOODWARD,	:
individually and on Behalf of All Others	:
Similarly Situated,	:
	:
Plaintiffs,	:
v.	:
	:
CITIGROUP INC., CHARLES PRINCE,	:
ROBERT E. RUBIN, C. MICHAEL	:
ARMSTRONG, ALAIN J. P. BELDA,	:
GEORGE DAVID, KENNETH T. DERR,	:
JOHN M. DEUTCH, ROBERTO	:
HERNANDEZ RAMIREZ, ANDREW N.	:
LIVERIS, ANN MULCAHEY, RICHARD	:
D. PARSONS, JUDITH RODIN, ROBERT	:
L. RYAN, FRANKLIN A. THOMAS, ANN	:
DIBBLE JORDAN, KLAUS KLEINFELD	:
AND DUDLEY C. MECUM, and JOHN	:
and JANE DOES 1-10,	:
	:
Defendants.	:
-----	

Civil Action No: 07cv11207

**DECLARATION OF LYNDIA J. GRANT IN SUPPORT  
OF MOTION TO ADMIT COUNSEL *PRO HAC VICE***

I, Lynda J. Grant, hereby declare as follows:

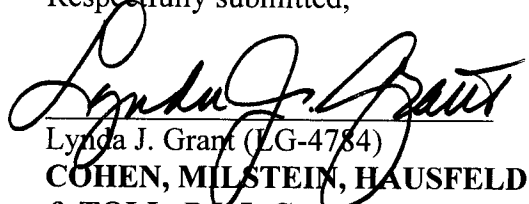
1. I am an attorney admitted to practice in the State of New York, and in the Southern and Eastern Districts of New York. I submit this Declaration in support of the motion to admit Bruce F. Rinaldi to the United States District Court for the Southern District of New York *pro hac vice* for purposes of this action.
2. I agree to act as local counsel for Bruce F. Rinaldi and to observe the Rules of this Court governing the conduct of attorneys.
3. Bruce F. Rinaldi is a member in good standing of the Bar of the District of Columbia.

For the foregoing reasons, it is respectfully requested that Bruce F. Rinaldi be admitted *pro hac vice* to the United States District Court for the Southern District of New York for purposes of this action.

I hereby declare under penalty of perjury that the foregoing is true and correct.

Dated: January 15, 2008

Respectfully submitted,



Lynda J. Grant (LG-4784)  
**COHEN, MILSTEIN, HAUSFELD  
& TOLL, P.L.L.C.**  
150 East 52<sup>nd</sup> Street, 30<sup>th</sup> Floor  
New York, New York 10022  
(212) 838-7797



UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X	
STEPHEN GRAY, individually and on	:
behalf of all others similarly situated,	:
	:
Plaintiff,	:
v.	:
	:
CITIGROUP INC., CHARLES PRINCE,	:
THE PLANS ADMINISTRATIVE	:
COMMITTEE OF CITIGROUP INC.,	:
THE 401(k) INVESTMENT	:
COMMITTEE, and JOHN DOES 1 - 20,	:
	:
Defendants.	:
-----X	
SHAUN ROSE, Individually and On	:
Behalf of All Others Similarly Situated,	:
	:
Plaintiff,	:
v.	:
	:
CITIGROUP INC., CHARLES PRINCE,	:
THE PLANS ADMINISTRATIVE	:
COMMITTEE OF CITIGROUP INC.,	:
THE 401(k) INVESTMENT	:
COMMITTEE, and JOHN DOES 1 - 10,	:
	:
Defendants.	:
-----X	
MEREDITH TRANBERG, individually	:
and on behalf of all others similarly situated	:
	:
Plaintiff,	:
v.	:
	:
CITIGROUP INC., CHARLES PRINCE,	:
THE PLANS ADMINISTRATIVE	:
COMMITTEE OF CITIGROUP INC.,	:
THE 401(k) INVESTMENT	:
COMMITTEE, and JOHN DOES 1 - 20,	:
	:
Defendants.	:
-----X	

Civil Action No: 07 Civ. 9790 (SHS)

**DECLARATION OF BRUCE F.  
RINALDI IN SUPPORT OF  
MOTION TO ADMIT COUNSEL  
PRO HAC VICE**

Civil Action No: 07 Civ. 10294

Civil Action No: 07 Civ. 10341

-----X  
ANTON RAPPOLD, individually and on :  
behalf of all others similarly situated, :

Plaintiff, :

v. :

CITIGROUP INC., CITIBANK, N.A., :  
CHARLES PRINCE, THE PLANS :  
ADMINISTRATIVE COMMITTEE OF :  
CITIGROUP INC., THE 401(k) :  
INVESTMENT COMMITTEE, and JOHN :  
and JANE DOES 1 - 10, :

Defendants. :

Civil Action No: 07 Civ. 10396

-----X  
SAMIER TADROS, on Behalf of All :  
Others Similarly Situated, :

Plaintiff, :

v. :

CITIGROUP INC., CHARLES O. :  
PRINCE, C. MICHAEL ARMSTRONG, :  
ALAIN J.P. BELDA, GEORGE DAVID, :  
KENNETH T. DERR, JOHN M. DEUTCH, :  
ROBERTO HERNANDEZ RAMIREZ, :  
ANN DIBBLE JORDAN, KLAUS :  
KLEINFELD, ANDREW N. LIVERIS, :  
ANNE MULCAHY, RICHARD D. :  
PARSONS, JUDITH RODIN, ROBERT E. :  
RUBIN, ROBERT E. RUBIN, FRANKLIN :  
A. THOMAS, JOHN DOES 1-20 (BEING :  
CURRENT AND FORMER MEMBERS :  
OF THE PLANS ADMINISTRATIVE :  
COMMITTEE OF CITIGROUP INC.) :  
and JOHN DOES 21-40 (BEING :  
CURRENT AND FORMER MEMBERS :  
OF THE INVESTMENT COMMITTEE :  
OF THE CITIGROUP INC. 401(K) PLAN), :

Defendants. :

Civil Action No: 07 Civ. 10442

-----X  
STEPHAN FIORINO, individually and on :  
behalf of all others similarly situated, :

Plaintiff, :

v. :

CITIGROUP INC., CITIBANK N.A., :  
CHARLES PRINCE, THE PLANS :  
ADMINISTRATIVE COMMITTEE OF :  
CITIGROUP INC., THE 401(k) :  
INVESTMENT COMMITTEE, and :  
JOHN DOES 1 - 20, :

Defendants. :

Civil Action No: 07 Civ. 10458

-----X  
JAMES BOLLA, individually and on behalf :  
of all others similarly situated, :

Plaintiff, :

v. :

CITIGROUP INC., CITIBANK N.A., :  
CHARLES PRINCE, THE PLANS :  
ADMINISTRATIVE COMMITTEE OF :  
CITIGROUP INC., THE 401(k) :  
INVESTMENT COMMITTEE, and :  
JOHN DOES 1 - 20, :

Defendants. :

Civil Action No: 07 Civ. 10461

-----X  
MARK GEROULO, individually, on behalf :  
of the CITIGROUP 401(k) Plan, the :  
CITIBUILDER 401 (K) PLAN FOR :  
PUERTO RICO, and all others similarly, :

Plaintiff, :

v. :

CITIGROUP, INC., CITIBANK, N.A., :  
THE PLAN ADMINISTRATIVE :  
COMMITTEE OF CITIGROUP, INC., :  
MICHAEL E. SCHLEIN, JOHN DOES :  
1-10, THE CITIGROUP 401(k) PLAN :  
INVESTMENT COMMITTEE and JOHN :  
DOES 10-20, C. MICHAEL :  
ARMSTRONG, ALAN J.P. BELDA, :  
GEORGE DAVID, KENNETH T. DERR, :  
JOHN M. DEUTCH, ROBERTO :  
HERNANDEZ, ANN DIBBLE JORDAN, :  
ANDREW N. LIVERIS, DUDLEY C. :  
MECUM, ANNE M. MULCAHY, :  
RICHARD D. PARSONS, ANDRALL E. :  
PEARSON, CHARLES PRINCE, JUDITH :  
RODIN, ROBERT E. RUBIN, FRANKLIN :  
A. THOMAS, SANFORD I. WEILL, :

Defendants. :

Civil Action No: 07 Civ. 10472

-----X

-----X  
ALAN STEVENS, on Behalf of Himself :  
and All Others Similarly Situated, :

Plaintiff, :

v. :

Civil Action No: 07 Civ. 11156

CITIGROUP INC., CITIBANK, N.A, :  
CHARLES PRINCE, C. MICHAEL :  
ARMSTRONG, ALAIN J.P. BELDA, :  
GEORGE DAVID, KENNETH T. DERR, :  
JOHN M. DEUTCH, PETER JOHNSON, :  
ROBERTO HERNANDEZ RAMIREZ, :  
ANDREW N. LIVERIS, ANNE :  
MULCAHEY, RICHARD D. PARSONS, :  
JUDITH RODIN, ROBERT E. RUBIN, :  
ROBERT L. RYAN, FRANKLIN A. :  
THOMAS, THE PLANS :  
ADMINISTRATION COMMITTEE OF :  
CITIGROUP, INC., THE INVESTMENT :  
COMMITTEE and JOHN DOES 1-30, :

Defendants. :

-----X  
STEPHEN GOLDSTEIN, on Behalf of :  
Himself and a Class of Persons Similarly :  
Situated, :

Plaintiff, :

v. :

Civil Action No: 07 Civ. 11158

CITIGROUP INC., THE PLANS :  
ADMINISTRATION COMMITTEE OF :  
CITIGROUP, INC., MICHAEL E. :  
SCHLEIN, CHARLES PRINCE, C. :  
MICHAEL ARMSTRONG, ALAIN J.P. :  
BELDA, GEORGE DAVID, KENNETH T. :  
DERR, JOHN M. DEUTCH, ROBERTO :  
HERNANDEZ RAMIREZ, ANDREW N. :  
LIVERIS, ANNE MULCAHEY, :  
RICHARD D. PARSONS, JUDITH :  
RODIN, ROBERT E. RUBIN, ROBERT L. :  
RYAN, AND FRANKLIN A. THOMAS, :  
And JOHN DOES 1-30, :

Defendants. :

-----X  
CHRIS SOUTHARD, on Behalf of All :  
Others Similarly Situated, :

Plaintiff, :

v. :

Civil Action No: 07 Civ. 11164

CITIGROUP INC., CHARLES O. :  
PRINCE, C. MICHAEL ARMSTRONG, :  
ALAIN J.P. BELDA, GEORGE DAVID, :  
KENNETH T. DERR, JOHN M. DEUTCH, :  
ROBERTO HERNANDEZ RAMIREZ, :  
ANN DIBBLE JORDAN, KLAUS :  
KLEINFELD, ANDREW N. LIVERIS, :  
ANNE MULCAHY, RICHARD D. :  
PARSONS, JUDITH RODIN, ROBERT E. :  
RUBIN, ROBERT E. RUBIN, FRANKLIN :  
A. THOMAS, JOHN DOES 1-20 (BEING :  
CURRENT AND FORMER MEMBERS :  
OF THE PLANS ADMINISTRATIVE :  
COMMITTEE OF CITIGROUP INC.) :  
and JOHN DOES 21-40 (BEING :  
CURRENT AND FORMER MEMBERS :  
OF THE INVESTMENT COMMITTEE :  
OF THE CITIGROUP INC. 401(K) PLAN), :

Defendants. :

-----X  
FRANCIA BRICK, individually and on :  
Behalf of all others similarly situated, :

Plaintiff, :

v. :

Civil Action No: 07 Civ. 11369

CITIGROUP INC., CHARLES PRINCE, :  
THE PLAN'S ADMINISTRATIVE :  
COMMITTEE OF CITIGROUP, INC., :  
THE 401(k) INVESTMENT COMMITTEE, :  
And JOHN DOES 1-10, :

Defendants. :

-----X

-----X  
WILLIAM and PATRICIA WOODWARD, :  
individually and on Behalf of All Others :  
Similarly Situated, :

Plaintiffs, :

v. :

CITIGROUP INC., CHARLES PRINCE, :  
ROBERT E. RUBIN, C. MICHAEL :  
ARMSTRONG, ALAIN J. P. BELDA, :  
GEORGE DAVID, KENNETH T. DERR, :  
JOHN M. DEUTCH, ROBERTO :  
HERNANDEZ RAMIREZ, ANDREW N. :  
LIVERIS, ANN MULCAHEY, RICHARD :  
D. PARSONS, JUDITH RODIN, ROBERT :  
L. RYAN, FRANKLIN A. THOMAS, ANN :  
DIBBLE JORDAN, KLAUS KLEINFELD :  
AND DUDLEY C. MECUM, and JOHN :  
and JANE DOES 1-10, :

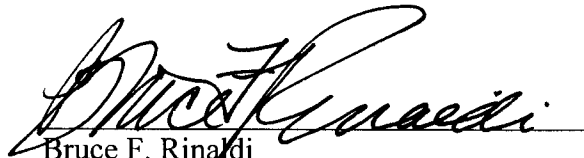
Defendants. :

Civil Action No: 07cv11207

1. I am an attorney with the law firm of Cohen, Milstein, Hausfeld & Toll, P.L.L.C.
2. I submit this Declaration in support of the motion of Lynda J. Grant for my admission to practice *pro hac vice* in the above captioned matter.
3. As shown in the Certificate of Good Standing annexed hereto as Exhibit 1, I am a member in good standing of the Bar of the District of Columbia, admitted June 6, 1997, Bar No. 455187.
4. There are no pending disciplinary proceedings against me in any State or Federal Court.
5. Wherefore, your declarant respectfully submits that he be permitted to appear as counsel and advocate *pro hac vice* in the above captioned cases.

I hereby declare under penalty of perjury that the foregoing is true and correct.

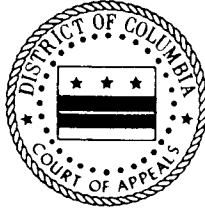
Dated January 10, 2008



Bruce F. Rinaldi  
Cohen, Milstein, Hausfeld & Toll, P.L.L.C.  
1100 New York Ave., NW, Suite 500 West  
Washington, DC 20005  
Phone: (202) 408-4600  
Fax: (202) 408-4699



# EXHIBIT 1



District of Columbia Court of Appeals  
Committee on Admissions  
500 Indiana Avenue, N.W. — Room 4200  
Washington, D. C. 20001  
202 / 879-2710

I, GARLAND PINKSTON, JR., Clerk of the District of Columbia  
Court of Appeals, do hereby certify that

Bruce F. Rinaldi

---

was on the 6<sup>th</sup> day of June, 1997  
duly qualified and admitted as an attorney and counselor and  
entitled to practice before this Court and is, on the date  
indicated below, an active member in good standing of this Bar.

In Testimony Whereof, I have  
hereunto subscribed my name  
and affixed the seal of this  
Court at the City of  
Washington, D.C., on January  
9, 2008.

GARLAND PINKSTON, JR., CLERK

By: Michelle Chase  
Deputy Clerk

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X	
STEPHEN GRAY, individually and on	:
behalf of all others similarly situated,	:
	:
Plaintiff,	:
v.	:
	:
CITIGROUP INC., CHARLES PRINCE,	:
THE PLANS ADMINISTRATIVE	:
COMMITTEE OF CITIGROUP INC.,	:
THE 401(k) INVESTMENT	:
COMMITTEE, and JOHN DOES 1 - 20,	:
	:
Defendants.	:
-----X	
SHAUN ROSE, Individually and On	:
Behalf of All Others Similarly Situated,	:
	:
Plaintiff,	:
v.	:
	:
CITIGROUP INC., CHARLES PRINCE,	:
THE PLANS ADMINISTRATIVE	:
COMMITTEE OF CITIGROUP INC.,	:
THE 401(k) INVESTMENT	:
COMMITTEE, and JOHN DOES 1 - 10,	:
	:
Defendants.	:
-----X	
MEREDITH TRANBERG, individually	:
and on behalf of all others similarly situated	:
	:
Plaintiff,	:
v.	:
	:
CITIGROUP INC., CHARLES PRINCE,	:
THE PLANS ADMINISTRATIVE	:
COMMITTEE OF CITIGROUP INC.,	:
THE 401(k) INVESTMENT	:
COMMITTEE, and JOHN DOES 1 - 20,	:
	:
Defendants.	:
-----X	

Civil Action No: 07 Civ. 9790 (SHS)

Civil Action No: 07 Civ. 10294

Civil Action No: 07 Civ. 10341

-----X	
ANTON RAPPOLD, individually and on	:
behalf of all others similarly situated,	:
	:
Plaintiff,	:
v.	:
	:
CITIGROUP INC., CITIBANK, N.A.,	:
CHARLES PRINCE, THE PLANS	:
ADMINISTRATIVE COMMITTEE OF	:
CITIGROUP INC., THE 401(k)	:
INVESTMENT COMMITTEE, and JOHN	:
and JANE DOES 1 - 10,	:
	:
Defendants.	:
-----X	
SAMIER TADROS, on Behalf of All	:
Others Similarly Situated,	:
	:
Plaintiff,	:
v.	:
	:
CITIGROUP INC., CHARLES O.	:
PRINCE, C. MICHAEL ARMSTRONG,	:
ALAIN J.P. BELDA, GEORGE DAVID,	:
KENNETH T. DERR, JOHN M. DEUTCH,	:
ROBERTO HERNANDEZ RAMIREZ,	:
ANN DIBBLE JORDAN, KLAUS	:
KLEINFELD, ANDREW N. LIVERIS,	:
ANNE MULCAHY, RICHARD D.	:
PARSONS, JUDITH RODIN, ROBERT E.	:
RUBIN, ROBERT E. RUBIN, FRANKLIN	:
A. THOMAS, JOHN DOES 1-20 (BEING	:
CURRENT AND FORMER MEMBERS	:
OF THE PLANS ADMINISTRATIVE	:
COMMITTEE OF CITIGROUP INC.)	:
and JOHN DOES 21-40 (BEING	:
CURRENT AND FORMER MEMBERS	:
OF THE INVESTMENT COMMITTEE	:
OF THE CITIGROUP INC. 401(K) PLAN),	:
	:
Defendants.	:
-----X	

Civil Action No: 07 Civ. 10396

Civil Action No: 07 Civ. 10442

-----X	
STEPHAN FIORINO, individually and on	:
behalf of all others similarly situated,	:
	:
Plaintiff,	:
v.	:
	:
CITIGROUP INC., CITIBANK N.A.,	:
CHARLES PRINCE, THE PLANS	:
ADMINISTRATIVE COMMITTEE OF	:
CITIGROUP INC., THE 401(k)	:
INVESTMENT COMMITTEE, and	:
JOHN DOES 1 - 20,	:
	:
Defendants.	:
-----X	
JAMES BOLLA, individually and on behalf	:
of all others similarly situated,	:
	:
Plaintiff,	:
v.	:
	:
CITIGROUP INC., CITIBANK N.A.,	:
CHARLES PRINCE, THE PLANS	:
ADMINISTRATIVE COMMITTEE OF	:
CITIGROUP INC., THE 401(k)	:
INVESTMENT COMMITTEE, and	:
JOHN DOES 1 - 20,	:
	:
Defendants.	:
-----X	

Civil Action No: 07 Civ. 10458

Civil Action No: 07 Civ. 10461

-----X  
MARK GEROULO, individually, on behalf :  
of the CITIGROUP 401(k) Plan, the :  
CITIBUILDER 401 (K) PLAN FOR :  
PUERTO RICO, and all others similarly, :

Plaintiff, :

v. :

CITIGROUP, INC., CITIBANK, N.A., :  
THE PLAN ADMINISTRATIVE :  
COMMITTEE OF CITIGROUP, INC., :  
MICHAEL E. SCHLEIN, JOHN DOES :  
1-10, THE CITIGROUP 401(k) PLAN :  
INVESTMENT COMMITTEE and JOHN :  
DOES 10-20, C. MICHAEL :  
ARMSTRONG, ALAN J.P. BELDA, :  
GEORGE DAVID, KENNETH T. DERR, :  
JOHN M. DEUTCH, ROBERTO :  
HERNANDEZ, ANN DIBBLE JORDAN, :  
ANDREW N. LIVERIS, DUDLEY C. :  
MECUM, ANNE M. MULCAHY, :  
RICHARD D. PARSONS, ANDRALL E. :  
PEARSON, CHARLES PRINCE, JUDITH :  
RODIN, ROBERT E. RUBIN, FRANKLIN :  
A. THOMAS, SANFORD I. WEILL, :

Defendants. :

Civil Action No: 07 Civ. 10472

-----X

-----X  
ALAN STEVENS, on Behalf of Himself :  
and All Others Similarly Situated, :  
 :  
 :  
Plaintiff, : Civil Action No: 07 Civ. 11156  
v. :  
 :  
CITIGROUP INC., CITIBANK, N.A, :  
CHARLES PRINCE, C. MICHAEL :  
ARMSTRONG, ALAIN J.P. BELDA, :  
GEORGE DAVID, KENNETH T. DERR, :  
JOHN M. DEUTCH, PETER JOHNSON, :  
ROBERTO HERNANDEZ RAMIREZ, :  
ANDREW N. LIVERIS, ANNE :  
MULCAHEY, RICHARD D. PARSONS, :  
JUDITH RODIN, ROBERT E. RUBIN, :  
ROBERT L. RYAN, FRANKLIN A. :  
THOMAS, THE PLANS :  
ADMINISTRATION COMMITTEE OF :  
CITIGROUP, INC., THE INVESTMENT :  
COMMITTEE and JOHN DOES 1-30, :  
 :  
Defendants. :  
-----X

STEPHEN GOLDSTEIN, on Behalf of :  
Himself and a Class of Persons Similarly :  
Situated, :  
 :  
 :  
Plaintiff, : Civil Action No: 07 Civ. 11158  
v. :  
 :  
CITIGROUP INC., THE PLANS :  
ADMINISTRATION COMMITTEE OF :  
CITIGROUP, INC., MICHAEL E. :  
SCHLEIN, CHARLES PRINCE, C. :  
MICHAEL ARMSTRONG, ALAIN J.P. :  
BELDA, GEORGE DAVID, KENNETH T. :  
DERR, JOHN M. DEUTCH, ROBERTO :  
HERNANDEZ RAMIREZ, ANDREW N. :  
LIVERIS, ANNE MULCAHEY, :  
RICHARD D. PARSONS, JUDITH :  
RODIN, ROBERT E. RUBIN, ROBERT L. :  
RYAN, AND FRANKLIN A. THOMAS, :  
And JOHN DOES 1-30, :  
 :  
Defendants. :

-----X	
CHRIS SOUTHARD, on Behalf of All	:
Others Similarly Situated,	:
	:
Plaintiff,	:
v.	:
	:
CITIGROUP INC., CHARLES O.	:
PRINCE, C. MICHAEL ARMSTRONG,	:
ALAIN J.P. BELDA, GEORGE DAVID,	:
KENNETH T. DERR, JOHN M. DEUTCH,	:
ROBERTO HERNANDEZ RAMIREZ,	:
ANN DIBBLE JORDAN, KLAUS	:
KLEINFELD, ANDREW N. LIVERIS,	:
ANNE MULCAHY, RICHARD D.	:
PARSONS, JUDITH RODIN, ROBERT E.	:
RUBIN, ROBERT E. RUBIN, FRANKLIN	:
A. THOMAS, JOHN DOES 1-20 (BEING	:
CURRENT AND FORMER MEMBERS	:
OF THE PLANS ADMINISTRATIVE	:
COMMITTEE OF CITIGROUP INC.)	:
and JOHN DOES 21-40 (BEING	:
CURRENT AND FORMER MEMBERS	:
OF THE INVESTMENT COMMITTEE	:
OF THE CITIGROUP INC. 401(K) PLAN),	:
	:
Defendants.	:

Civil Action No: 07 Civ. 11164

-----	
FRANCIA BRICK, individually and on	:
Behalf of all others similarly situated,	:
	:
Plaintiff,	:
v.	:
	:
CITIGROUP INC., CHARLES PRINCE,	:
THE PLAN'S ADMINISTRATIVE	:
COMMITTEE OF CITIGROUP, INC.,	:
THE 401(k) INVESTMENT COMMITTEE,	:
And JOHN DOES 1-10,	:
	:
Defendants.	:
-----	

:

Civil Action No: 07 Civ. 11369



-X

WILLIAM and PATRICIA WOODWARD, :	
individually and on Behalf of All Others :	
Similarly Situated, :	
Plaintiffs, :	Civil Action No: 07cv11207
v. :	
CITIGROUP INC., CHARLES PRINCE, :	
ROBERT E. RUBIN, C. MICHAEL :	
ARMSTRONG, ALAIN J. P. BELDA, :	
GEORGE DAVID, KENNETH T. DERR, :	
JOHN M. DEUTCH, ROBERTO :	
HERNANDEZ RAMIREZ, ANDREW N. :	
LIVERIS, ANN MULCAHEY, RICHARD :	
D. PARSONS, JUDITH RODIN, ROBERT :	
L. RYAN, FRANKLIN A. THOMAS, ANN :	
DIBBLE JORDAN, KLAUS KLEINFELD :	
AND DUDLEY C. MECUM, and JOHN :	
and JANE DOES 1-10, :	
Defendants. :	

**[PROPOSED] ORDER GRANTING APPLICATION OF  
BRUCE F. RINALDI FOR ADMISSION *PRO HAC VICE***

This matter coming before the Court by Motion submitted by Lynda J. Grant, seeking the admission of Bruce F. Rinaldi to the United States District Court for the Southern District of New York *pro hac vice* for purposes of this action, and the Court having considered the Affidavit of Bruce F. Rinaldi submitted in support thereof, and for good cause shown,

IT IS ON this \_\_\_\_\_ day of \_\_\_\_\_, 2008,

ORDERED that:

1. Bruce F. Rinaldi is hereby granted admission *pro hac vice* to the United States District Court for the Southern District of New York, for the purpose of

appearing in this action, pursuant to Rule 1.3(c) of the Local Rules of the United States District Court for the Southern District of New York;

2. Bruce F. Rinaldi is required to abide by and is subject to the Local Rules of the United States District Court for the Southern District of New York; and

3. Bruce F. Rinaldi is required to notify the Court immediately of any matter that affects his standing at the Bar of any court.

---

United States District Judge

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X			
STEPHEN GRAY, individually and on	:	<b>CERTIFICATE OF SERVICE</b>	
behalf of all others similarly situated,	:		
	:		
Plaintiff,	:		Civil Action No: 07 Civ. 9790 (SHS)
v.	:		
	:		
CITIGROUP INC., CHARLES PRINCE,	:		
THE PLANS ADMINISTRATIVE	:		
COMMITTEE OF CITIGROUP INC.,	:		
THE 401(k) INVESTMENT	:		
COMMITTEE, and JOHN DOES 1 - 20,	:		
	:		
Defendants.	:		
-----X			
SHAUN ROSE, Individually and On	:	Civil Action No: 07 Civ. 10294	
Behalf of All Others Similarly Situated,	:		
	:		
Plaintiff,	:		
v.	:		
	:		
CITIGROUP INC., CHARLES PRINCE,	:		
THE PLANS ADMINISTRATIVE	:		
COMMITTEE OF CITIGROUP INC.,	:		
THE 401(k) INVESTMENT	:		
COMMITTEE, and JOHN DOES 1 - 10,	:		
	:		
Defendants.	:		
-----X			
MEREDITH TRANBERG, individually	:	Civil Action No: 07 Civ. 10341	
and on behalf of all others similarly situated	:		
	:		
Plaintiff,	:		
v.	:		
	:		
CITIGROUP INC., CHARLES PRINCE,	:		
THE PLANS ADMINISTRATIVE	:		
COMMITTEE OF CITIGROUP INC.,	:		
THE 401(k) INVESTMENT	:		
COMMITTEE, and JOHN DOES 1 - 20,	:		
	:		
Defendants.	:		
-----X			

-----X  
ANTON RAPPOLD, individually and on :  
behalf of all others similarly situated, :

Plaintiff, :

v. :

CITIGROUP INC., CITIBANK, N.A., :  
CHARLES PRINCE, THE PLANS :  
ADMINISTRATIVE COMMITTEE OF :  
CITIGROUP INC., THE 401(k) :  
INVESTMENT COMMITTEE, and JOHN :  
and JANE DOES 1 - 10, :

Defendants. :

Civil Action No: 07 Civ. 10396

-----X  
SAMIER TADROS, on Behalf of All :  
Others Similarly Situated, :

Plaintiff, :

v. :

CITIGROUP INC., CHARLES O. :  
PRINCE, C. MICHAEL ARMSTRONG, :  
ALAIN J.P. BELDA, GEORGE DAVID, :  
KENNETH T. DERR, JOHN M. DEUTCH, :  
ROBERTO HERNANDEZ RAMIREZ, :  
ANN DIBBLE JORDAN, KLAUS :  
KLEINFELD, ANDREW N. LIVERIS, :  
ANNE MULCAHY, RICHARD D. :  
PARSONS, JUDITH RODIN, ROBERT E. :  
RUBIN, ROBERT E. RUBIN, FRANKLIN :  
A. THOMAS, JOHN DOES 1-20 (BEING :  
CURRENT AND FORMER MEMBERS :  
OF THE PLANS ADMINISTRATIVE :  
COMMITTEE OF CITIGROUP INC.) :  
and JOHN DOES 21-40 (BEING :  
CURRENT AND FORMER MEMBERS :  
OF THE INVESTMENT COMMITTEE :  
OF THE CITIGROUP INC. 401(K) PLAN), :

Defendants. :

Civil Action No: 07 Civ. 10442

-----X

-----X  
STEPHAN FIORINO, individually and on :  
behalf of all others similarly situated, :  
:  
Plaintiff, :  
v. :  
:  
CITIGROUP INC., CITIBANK N.A., :  
CHARLES PRINCE, THE PLANS :  
ADMINISTRATIVE COMMITTEE OF :  
CITIGROUP INC., THE 401(k) :  
INVESTMENT COMMITTEE, and :  
JOHN DOES 1 - 20, :  
:  
Defendants. :

Civil Action No: 07 Civ. 10458

-----X  
JAMES BOLLA, individually and on behalf :  
of all others similarly situated, :  
:  
Plaintiff, :  
v. :  
:  
CITIGROUP INC., CITIBANK N.A., :  
CHARLES PRINCE, THE PLANS :  
ADMINISTRATIVE COMMITTEE OF :  
CITIGROUP INC., THE 401(k) :  
INVESTMENT COMMITTEE, and :  
JOHN DOES 1 - 20, :  
:  
Defendants. :

Civil Action No: 07 Civ. 10461

-----X

-----X  
MARK GEROULO, individually, on behalf :  
of the CITIGROUP 401(k) Plan, the :  
CITIBUILDER 401 (K) PLAN FOR :  
PUERTO RICO, and all others similarly, :

Plaintiff, :

v. :

CITIGROUP, INC., CITIBANK, N.A., :  
THE PLAN ADMINISTRATIVE :  
COMMITTEE OF CITIGROUP, INC., :  
MICHAEL E. SCHLEIN, JOHN DOES :  
1-10, THE CITIGROUP 401(k) PLAN :  
INVESTMENT COMMITTEE and JOHN :  
DOES 10-20, C. MICHAEL :  
ARMSTRONG, ALAN J.P. BELDA, :  
GEORGE DAVID, KENNETH T. DERR, :  
JOHN M. DEUTCH, ROBERTO :  
HERNANDEZ, ANN DIBBLE JORDAN, :  
ANDREW N. LIVERIS, DUDLEY C. :  
MECUM, ANNE M. MULCAHY, :  
RICHARD D. PARSONS, ANDRALL E. :  
PEARSON, CHARLES PRINCE, JUDITH :  
RODIN, ROBERT E. RUBIN, FRANKLIN :  
A. THOMAS, SANFORD I. WEILL, :

Defendants. :

Civil Action No: 07 Civ. 10472

-----X

-----X  
ALAN STEVENS, on Behalf of Himself :  
and All Others Similarly Situated, :  
: :  
Plaintiff, :  
v. :  
: :  
CITIGROUP INC., CITIBANK, N.A, :  
CHARLES PRINCE, C. MICHAEL :  
ARMSTRONG, ALAIN J.P. BELDA, :  
GEORGE DAVID, KENNETH T. DERR, :  
JOHN M. DEUTCH, PETER JOHNSON, :  
ROBERTO HERNANDEZ RAMIREZ, :  
ANDREW N. LIVERIS, ANNE :  
MULCAHEY, RICHARD D. PARSONS, :  
JUDITH RODIN, ROBERT E. RUBIN, :  
ROBERT L. RYAN, FRANKLIN A. :  
THOMAS, THE PLANS :  
ADMINISTRATION COMMITTEE OF :  
CITIGROUP, INC., THE INVESTMENT :  
COMMITTEE and JOHN DOES 1-30, :  
: :  
Defendants. :

Civil Action No: 07 Civ. 11156

-----X  
STEPHEN GOLDSTEIN, on Behalf of :  
Himself and a Class of Persons Similarly :  
Situated, :  
: :  
Plaintiff, :  
v. :  
: :  
CITIGROUP INC., THE PLANS :  
ADMINISTRATION COMMITTEE OF :  
CITIGROUP, INC., MICHAEL E. :  
SCHLEIN, CHARLES PRINCE, C. :  
MICHAEL ARMSTRONG, ALAIN J.P. :  
BELDA, GEORGE DAVID, KENNETH T. :  
DERR, JOHN M. DEUTCH, ROBERTO :  
HERNANDEZ RAMIREZ, ANDREW N. :  
LIVERIS, ANNE MULCAHEY, :  
RICHARD D. PARSONS, JUDITH :  
RODIN, ROBERT E. RUBIN, ROBERT L. :  
RYAN, AND FRANKLIN A. THOMAS, :  
And JOHN DOES 1-30, :  
: :  
Defendants. :

Civil Action No: 07 Civ. 11158

-----X  
CHRIS SOUTHARD, on Behalf of All :  
Others Similarly Situated, :

Plaintiff, :

v. :

CITIGROUP INC., CHARLES O. :  
PRINCE, C. MICHAEL ARMSTRONG, :  
ALAIN J.P. BELDA, GEORGE DAVID, :  
KENNETH T. DERR, JOHN M. DEUTCH, :  
ROBERTO HERNANDEZ RAMIREZ, :  
ANN DIBBLE JORDAN, KLAUS :  
KLEINFELD, ANDREW N. LIVERIS, :  
ANNE MULCAHY, RICHARD D. :  
PARSONS, JUDITH RODIN, ROBERT E. :  
RUBIN, ROBERT E. RUBIN, FRANKLIN :  
A. THOMAS, JOHN DOES 1-20 (BEING :  
CURRENT AND FORMER MEMBERS :  
OF THE PLANS ADMINISTRATIVE :  
COMMITTEE OF CITIGROUP INC.) :  
and JOHN DOES 21-40 (BEING :  
CURRENT AND FORMER MEMBERS :  
OF THE INVESTMENT COMMITTEE :  
OF THE CITIGROUP INC. 401(K) PLAN), :

Defendants. :

-----  
FRANCIA BRICK, individually and on :  
Behalf of all others similarly situated, :

Plaintiff, :

v. :

CITIGROUP INC., CHARLES PRINCE, :  
THE PLAN'S ADMINISTRATIVE :  
COMMITTEE OF CITIGROUP, INC., :  
THE 401(k) INVESTMENT COMMITTEE, :  
And JOHN DOES 1-10, :

Defendants. :  
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Civil Action No: 07 Civ. 11164

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Civil Action No: 07 Civ. 11369



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WILLIAM and PATRICIA WOODWARD, :  
individually and on Behalf of All Others :  
Similarly Situated, :

Plaintiffs, :

v. :

CITIGROUP INC., CHARLES PRINCE, :  
ROBERT E. RUBIN, C. MICHAEL :  
ARMSTRONG, ALAIN J. P. BELDA, :  
GEORGE DAVID, KENNETH T. DERR, :  
JOHN M. DEUTCH, ROBERTO :  
HERNANDEZ RAMIREZ, ANDREW N. :  
LIVERIS, ANN MULCAHEY, RICHARD :  
D. PARSONS, JUDITH RODIN, ROBERT :  
L. RYAN, FRANKLIN A. THOMAS, ANN :  
DIBBLE JORDAN, KLAUS KLEINFELD :  
AND DUDLEY C. MECUM, and JOHN :  
and JANE DOES 1-10, :

Civil Action No: 07cv11207

**CERTIFICATE OF SERVICE**

I, Theresa Graham, hereby certify that I am over the age of 18, and am employed by the Law Firm of Cohen, Milstein, Hausfeld & Toll, P.L.L.C. On this 15<sup>th</sup> day of January, 2008, I caused true and accurate copies of the foregoing Motion to Admit Counsel *Pro Hac Vice*, Declaration of Lynda J. Grant in Support of Motions to Admit Counsel *Pro Hac Vice*, Declaration of Bruce F. Rinaldi in Support of Motion to Admit Counsel *Pro Hac Vice* and the Certificate of Good Standing attached thereto, and Proposed Order for Admission *Pro Hac Vice* on Written Motion, via First-Class mail, upon the following counsel of record:

**Citigroup ERISA Litigation Service List**

<b>Attorneys for Defendants</b>  Lawrence B. Pedowitz, Esq. John Lynch, Esq. Bradley R. Wilson, Esq. WATCHELL, LIPTON, ROSEN & KATZ LLP 51 West 52 <sup>nd</sup> Street New York, New York 10019-6150  Telephone: 212-403-1000 Fax: 212-403-2000	<b>Attorneys for Plaintiff Samier Tadros (07-cv-10442-SHS)</b>  Robert I. Harwood, Esq. Jeffrey M. Norton, Esq. HARWOOD, FEFFER LLP 488 Madison Avenue New York, New York 10022  Telephone: 212-935-7400 Fax: 212-753-3630
<b>Attorneys for Plaintiff Anton Rappold (07-cv-10396-UA)</b>  Susan Salvetti, Esq. ZWWERLING, SCHACHTER & ZWERLING LLP 41 Madison Avenue New York, New York 10010  Telephone: 212-223-3900 Fax: 212-371-5969	<b>Attorneys for Plaintiff James Bolla (07-cv-10461-UA)</b>  Ann D. White, Esq. ANN D. WHITE LAW OFFICES P.C. 165 Township Line Rd, Ste. 2400 Jenkintown, PA 19046-3535  Telephone: 215-481-0273 Fax: 215-481-0271

<p><b>Attorneys for Plaintiff Meredith Tranberg (07-cv-10341-UA)</b></p> <p>Jeffrey Squire, Esq. BRAGAR WEXLER &amp; EAGEL, PC 885 Third Avenue, Suite 3040 New York, New York 10022</p> <p>Telephone: 212-308-5858 Fax: 212-486-0462</p>	<p><b>Attorneys for Plaintiff Mark Geroulo (07-cv-10472-UA)</b></p> <p>Romen Sarraf, Esq. Joseph Gentile SARRAF GENTILE LLP 485 Seventh Avenue, Suite 1005 New York, New York 10018</p> <p>Telephone: 212-868-3610 Fax: 212-918-7967</p> <p>Robert A. Iazard, Esq. SCHATZ NOBEL IZARD P.C. 20 Church Street, Suite 1700 Hartford, CT 06103</p> <p>Telephone: 860-493-6292 Fax: 860-493-6290</p>
<p><b>Attorneys for Plaintiff Chris Southard (07-cv-11164)</b></p> <p>Thomas J. McKenna, Esq. GAINEY &amp; MCKENNA 295 Madison Avenue, 4<sup>th</sup> Floor New York, New York 10017</p> <p>Telephone: 212-983-1300 Fax: 212-983-0383</p>	<p><b>Attorneys for Plaintiff Alan Stevens (07-cv-11156)</b></p> <p>Lori G. Feldman, Esq. Arvind B. Khurana, Esq. MILBERG WEISS LLP One Pennsylvania Plaza New York, New York, 10019</p> <p>Telephone: 212-594-5300 Fax: 212-868-1229</p>
<p><b>Attorneys for Plaintiff Stephen Gray (07-cv-9790-SHS)</b></p> <p>Marian P. Rosner, Esq. Robert C. Finkel, Esq. Andrew E. Lencyk, Esq. WOLF POPPER LLP 845 Third Avenue New York, New York 10022</p> <p>Telephone: 212-759-4600 Fax: 212-486-2093</p>	<p><b>Attorneys for Plaintiff Steven Goldstein (07-cv-11158-UA)</b></p> <p>Edwin J. Mills, Esq. STULL, STULL &amp; BRODY 6 East 45<sup>th</sup> Street New York, New York 10017</p> <p>Telephone: 212-687-7230 Fax: 212-490-2022</p>

**Attorneys for Plaintiff William Woodward  
(07-cv-11207-UA)**

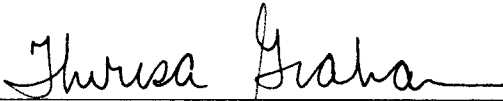
Bruce F. Finaldi  
COHEN MILSTEIN HAUSFELD & TOLL  
(DC)  
1100 New York Avenue, N.W., Suite 500W  
Washington, DC 20005

Telephone: 202-408-4600  
Fax: 202-408-4699

**Attorneys for Plaintiff Francina Brick  
(07-cv-11369-UA)**

William R. Weinstein  
Steven L. Wittels  
Jeremy Heisler  
SANFORD WITTELS & HEISLER, LLP  
950 Third Avenue, 10<sup>th</sup> Floor  
New York, New York 10022

Telephone: 646-723-2947  
Fax: 646-723-2948

  
Theresa Graham